

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO

ALISON ENDICOTT-QUINONES,  
Guardian ad Litem, on behalf of  
A.D., R.B., E.B., and M.B.,  
Minor children,

Plaintiffs,

v.

Cause No: 21-cv-00368 KG-JHR

PATRICIA GARZA, in her individual  
And official capacity, REBECCA LIGGETT,  
In her individual and official capacity;  
BRENDA SALDANA, in her individual and  
official capacity; NEW MEXICO CHILDREN  
YOUTH & FAMILIES DEPARTMENT;  
And DOES 1-50,

Defendants.

**PLAINTIFFS' UNOPPOSED MOTION FOR EXTENSION OF THE PAGE LIMIT FOR  
THEIR RESPONSE TO DEFENDANTS' MOTION TO DISMISS**

Plaintiffs, by and through their Counsel of Record, Benjamin Gubernick, Todd Bullion, Robert J. Gorence and Jason Bowles, hereby moves for an extension of the 24-page limit for responses provided for in Local Rule of Civil Procedure 7.5. Plaintiffs' response to the Defendants' Motion to Dismiss will be approximately 6 pages over the limit. In support of this Motion, Plaintiffs state as follows:

1. This is a legally complicated case.
2. Plaintiffs cannot adequately brief their response to Defendants' Motion to Dismiss in only 24-pages.
3. Undersigned counsel contacted counsel for the Defendants, James Grubel, and he does not oppose the relief requested in this Motion.

WHEREFORE, Plaintiffs respectfully request that the Court extend the 24-page limit by 6 pages to 30 pages for Plaintiffs' response to the Defendants' Motion to Dismiss.

Respectfully submitted,

**GUBERNICK LAW P.L.L.C.**

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### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 30th day of September, 2021, I filed the foregoing electronically through the Court's CM/ECF system, which caused the following counsel to be served by electronic means, as more fully reflected on the Notice of Electronic Filing:

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*Attorneys for Patricia Garza, Rebecca Liggett, Brenda Saldana, and the New Mexico Children, Youth, and Families Department*

/s/ Robert J. Gorence  
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